

### **309 - Social Media Policy**

This policy establishes a set of rules and guidelines for any activity and participation in “social media” by all “users.” These rules are intended to be adaptable to the changes in technology and norms of online communication and behavior, and may be amended by OMI at any time, for any reason, without notice to users.

**Definitions.** For purposes of this policy:

- The term “social media” applies to any web-based and mobile technologies, in use now or developed in the future, that enable individuals or entities to disseminate or receive information, communicate, or otherwise interact, and includes, without limitation, email, texting, messaging, social networking, blogging, micro-blogging, bulletin boards, and so on, through providers such as Facebook, LinkedIn, Twitter, YouTube, Snap Chat, Instagram or others.
- The term “users” refers to OMI employees, directors, volunteers, and interns.

**Exercise Responsibility Online.** You are personally responsible for any of your social media activity conducted with an OMI email address or on an OMI website or page, and/or which can be traced back to an OMI domain, and/or which uses OMI’s Information Systems and/or which expressly or implicitly identifies you as an employee of the OMI.

**Follow Existing Policies And Terms Of Use.** Observe and follow (i) the policies in this Handbook; (ii) the policies of the particular online/social networking venue; and (iii) applicable law. This means that you are prohibited from using social media to post or display comments about coworkers or supervisors or OMI that are defamatory, libelous, threatening, intimidating, or a violation of OMI’s workplace policies against discrimination, harassment, or hostility on account of race, religious creed, religious observance, color, age, sex, sexual orientation, gender identity, gender expression, genetic information, national origin, religion, marital status, familiar status, medical condition as defined by Minnesota law, disability, genetics, military service, pregnancy, or any other characteristic protected by applicable local, state, and/or federal law. In addition, in light of the nature

of our business, there are also risks for HIPAA violations whenever anyone posts any information which may be prohibited by law.

**Recognize Others' Privacy.** Before sharing a comment, post, picture or video about or from a friend or colleague through any type of social media, it is a good practice to be courteous and first obtain his or her consent.

It also is inappropriate to use or disclose personal information (as explained below) about another individual or use or disclose OMI's confidential or proprietary information in any form of social media. For purposes of this Policy, personal information means an individual's Social Security number, financial account number, driver's license number, medical information (including family medical history) and other highly sensitive information, as well as, if applicable, information covered by OMI's written information security program. OMI confidential or proprietary information as specifically defined in OMI's HIPAA and Confidentiality Policy. All OMI rules regarding OMI confidential or proprietary information and personal information apply in full to social media, such as blogs or social networking sites. For example, any information that cannot be disclosed through a conversation, a note, a letter or an e-mail also cannot be disclosed in a blog. Sharing this type of information, even unintentionally, can potentially result in harm to the individual, harm to the OMI's business, and ultimately you and/or OMI being sued by an individual, other businesses or the government.

**Be Accurate And Truthful.** Before posting any online material, ensure that the material is not knowingly false; instead, try to be accurate and truthful. If you find that you've made a mistake, admit it, apologize, correct it and move on. You should never post anything that is maliciously false.

**Commenting on OMI.** Additionally, when commenting on or promoting any OMI product or service on any form of social media, you must clearly and conspicuously disclose your relationship with the OMI to the members and readers of that social media.

Do not use OMI's network to influence polls, rankings, or web traffic. This is called "astroturfing" or "sock-puppeting" and is highly unethical. You are not to use the size and breadth of the OMI network to unduly influence polls, rankings, or web traffic where said traffic is a measure of success or popularity of a particular political opinion.

**Manage Your Expectation Of Privacy.** Consistent with OMI's Electronic Communications Policy, OMI may access and monitor its Information Systems and obtain the communications within the systems, including email, Internet usage, and the like, with or without notice to users of the system, in the ordinary course of business when we deem it appropriate to do so. As such, when using such systems, you should have no expectation of privacy with regard to time, frequency, content or other aspects of your use, including the websites you visit and other Internet/Intranet activity. The reasons OMI accesses and monitors these systems include but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; and complying with legal and regulatory requirements.

**Interact On Your Time.** OMI respects the right of any employee to participate in social media, such as maintaining a blog or participating in online forums. However, to protect OMI's interests and to oversee employees' focus on their job duties, employees may not post on a blog or social networking site during their working time. Working time includes the time during which any of the employees involved are actually scheduled to work, but does not include scheduled rest periods, meal breaks and other specified times when employees are not expected to be working.

**Identify Any Copyrighted Or Borrowed Material With Citations And Links.** When publishing any online material through social media that includes another's direct or paraphrased quotes, thoughts, ideas, photos, or videos, always use citations and link to the original material where applicable.

Nothing in this policy is designed to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment. Should you have any questions about this policy, please contact Human Resources.